

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

CHARLENE CARTER,

Plaintiff,

V.

SOUTHWEST AIRLINES CO., AND  
TRANSPORT WORKERS UNION OF AMERICA,  
LOCAL 556,

Defendants.

Civil Case No. 3:17-cv-02278-X

**JOINT MOTION TO EXTEND THE DEADLINE FOR ALL PARTIES TO RESPOND  
TO PENDING MOTIONS**

Southwest Airlines Co. (“Southwest”), the Transport Workers Union of America, Local 556 (“Local 556”), and Charlene Carter (“Carter”) file this Joint Motion to Extend the Deadline for All Parties to Respond to Pending Motions (*see* dkt. nos. 166, 169, 171, 181) as specified below to **Monday, October 4, 2021**. In support of this Motion, the parties state as follows:

1. On September 2, 2021, Southwest filed a motion for summary judgment. Dkt. No. 166.
2. On September 2, 2021, Charlene Carter (“Carter”) filed a motion for summary judgment and motion for leave to file her motion for summary judgment under seal. Dkt. Nos. 169, 171.
3. On September 9, 2021, the Transport Workers Union of America, Local 556 (“Local 556”) filed a motion for summary judgment. Dkt. No. 181.

4. Each of the motions are lengthy, contain numerous legal arguments, and include hundreds of pages of exhibits.

5. The current deadline for Southwest and Local 556 to respond to Carter's above motions is September 23, 2021.

6. The current deadline for Carter to respond to Southwest's motion is September 23, 2021.

7. The current deadline for Carter to respond to Local 556's motion is September 30, 2021.

8. Separately, the deadline for Southwest to respond to Carter's pending motion to compel (dkt. no. 173) is September 29, 2021.

9. Given the length and complexity of the parties' respective filings additional time to respond is appropriate to ensure the all parties are able to adequately review the record and present their legal arguments to the Court.

10. Accordingly, there is good cause to grant an extension of the deadline for all parties to respond to the motions identified in paragraphs 1-3 above to **October 4, 2021**.

11. Counsel for Southwest has conferred with counsel for Carter and Local 556 by phone and they indicated that they support the relief requested herein.

12. Granting this Motion will not create undue delay or otherwise interfere with other Court deadlines.

13. Therefore, the parties request that the deadline for Carter to respond to Southwest's and Local 556's motions for summary judgment (dkt. nos. 166, 181); and for Southwest and Local 556 respond to Carter's motion for summary judgment and motion for leave to file motion for summary judgment under seal (dkt. Nos. 169, 171) be set for **October 4, 2021**.

Dated: September 21, 2021

Respectfully submitted,

/s/ Brian K. Morris

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